

IN RE:	:	CHAPTER 13
JENNIFER AMI HOFFMAN	:	
fdba Hoffman Law Offices	:	CASE NO. 1:17-bk-02956
Debtor	:	
	:	
NATIONSTAR MORTGAGE LLC,	:	
Movant	:	
	:	
v.	:	
	:	
JENNIFER AMI HOFFMAN	:	
fdba Hoffman Law Offices,	:	
Respondent	:	
	:	
JACK N ZAHAROPOULOS,	:	
Trustee,	:	

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
6. Debtor has recently made all payments due and this averment is therefore denied.
7. Debtor has recently made all payments due and this averment is therefore denied
8. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
9. Movant is protected by an equity cushion and it is therefore denied that Movant has demonstrated cause for relief from stay.

10. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

11. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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